

EXHIBIT “B”

EXHIBIT “B”

1 KENT P. WOODS, ESQ.
Nevada Bar # 12306
2 WOODS ERICKSON & WHITAKER LLP
1349 Galleria Drive #200
3 Henderson, NV 89014
Email: kwoods@woodserickson.com
4 Tel: (702) 433-9696
Fax: (702) 434-0615
5 *Attorneys for M.F. Corporate Services (Nevada) Limited*
6 *and Patricia Amunategui*

7 U.S. DISTRICT COURT
8 FOR THE
9 DISTRICT OF NEVADA

10 NML CAPITAL, LTD.,
11 Plaintiff,
12 vs.
13 THE REPUBLIC OF ARGENTINA,
14 Defendant.
15
16

2:14-cv-01573-LDG-PAL

DECLARATION OF PATRICIA
AMUNATEGUI IN SUPPORT OF
NML CAPITAL LTD.'S MOTION TO
FILE UNDER SEAL

17 Patricia Amunategui makes this Declaration pursuant to 28 U.S.C. § 1746:
18

19 1. I am Patricia Amunategui, the general manager and sole full-time employee of
20 M.F. Corporate Services (Nevada) Limited ("MF Nevada"). MF Nevada and I are non-parties to
21 this proceeding; additionally, MF Nevada and I are non-parties who have been subjected to a
22 large number of subpoenas and inquiries in a related proceeding, captioned as *NML Capital, Ltd.*
23 *v. Republic of Argentina*, Case No. 2:14-cv-00492-RFB-VCF, all without any preliminary
24 showing that we are in fact related to the underlying litigation.

25 2. I submit this declaration in support of NML Capital, Ltd.'s Motion to File Under
26 Seal its Memorandum in Response to Nonparty Val de Loire LLC's Motion to Quash Subpoena
27 (the "Motion"). I have personal knowledge of the facts set forth herein, and if called upon to do
28 so, would testify thereto. I have reviewed the Motion, as well as the redacted and unredacted

1 Memorandum that NML has requested to file under seal. While I dispute vehemently many of
2 the characterizations of my business, I submit this declaration in support of my own privacy and
3 the negotiated protections ordered by this Court in its related proceeding.

4 3. MF Nevada is a corporation, formed under the laws of the State of Nevada. MF
5 Nevada provides services as a commercial registered agent. Primarily, MF Nevada provides
6 services to a Panama-based law firm known as Mossack Fonseca & Co. ("Mossack Fonseca")
7 pursuant to an independent contractor agreement.

8 4. In the course of its services to Mossack Fonseca, MF Nevada is entrusted with
9 confidential and/or sensitive information concerning Mossack Fonseca's clients. Accordingly,
10 my understanding of the agreement between the two entities is that MF Nevada is required to
11 maintain its files and documents in strict confidence, subject only to applicable law and
12 regulation. The agreement between MF Nevada and Mossack Fonseca is terminable largely at
13 will, subject only to certain, minor noticing requirements.

14 5. The ongoing litigation and seemingly endless inquiry into MF Nevada's business
15 and its relationship with Mossack Fonseca has already subjected MF Nevada's relationship with
16 Mossack Fonseca to substantial strain. It has become a dramatic drain on MF Nevada's limited
17 and resources, as well as my own health and well being.

18 6. The underlying litigation that has given rise to this proceeding has attracted
19 substantial media attention, both domestically and abroad. As a result, I routinely receive
20 telephone calls from both domestic and foreign journalists. Often, regardless of my response or
21 lack of response to their questions, these inquiries result in articles that recite spurious
22 allegations including, for instance, that I am personally involved in money laundering efforts.
23 Foreign journalists, particularly from Latin America, do not appear to abide by any standards
24 fact-checking or journalistic integrity. As a result, my personal name and reputation have been
25 seriously damaged, including among my colleagues and potential future employers. By way of
26 example, attached to this affidavit as Exhibit A is an article from a foreign publication that offers
27 these allegations.

28

1 7. I am not a public figure; I am not a party to the underlying litigation; I do not have
2 any actual or alleged connection to NML's investigation; and most important, I do not have the
3 resources necessary to combat a trans-continental public relations campaign against me
4 personally or to combat libelous allegations. Through this process, MF Nevada and I have done
5 everything we can to assist with NML's seemingly endless investigation, subject only to
6 restrictions imposed by law and by the agreement between MF Nevada and Mossack Fonseca.

7 8. Earlier this year, I received a subpoena from NML in my personal capacity,
8 despite having no actual or alleged connection to any of the events giving rise to the underlying
9 litigation. Acting through my attorney, I moved to quash the subpoena, largely on these grounds,
10 in addition to the extreme burden imposed by NML's boundless requests. During the meet and
11 confer process, I agreed to sit for a deposition only on the agreement by NML that it would hold
12 the deposition and all descriptions of the deposition in strictest confidence. Understanding that
13 certain issues raised by my deposition would continue to be litigated, our agreement
14 acknowledged that descriptions of my deposition would ultimately need to be filed with the
15 Court. Accordingly, I, through my attorney, negotiated that any such filings would be made
16 under seal. Hence, NML's Motion.

17 9. The deposition transcript NML has offered as evidence in its Motion is not
18 limited or restricted in any way. It is not, for instance, limited to only those quotations or
19 sections that are necessary for its cited purpose. Accordingly, the transcript and its exhibits
20 include, among other items, such personal information as my salary, benefits, employment terms,
21 travel dates, personal employment history, and so on. Certain of the exhibits included in the
22 deposition transcript contain my social security number, passport number, and other personal
23 identifying information. Given the media scrutiny at play in this case, permitting the transcript
24 to be filed publicly would expose this information, in effect, to the entire world. Nor can we rely
25 on journalistic standards to protect my personal or otherwise confidential information from
26 exposure.

27 10. Additionally, the contents of the deposition concern a confidential relationship
28 between MF Nevada and its client, Mossack Fonseca. If this information is exposed to the world

1 at large, I anticipate that MF Nevada's contract will be terminated. I, in turn, will lose my
2 livelihood.

3 11. Even taking the worst of NML's spurious allegations as true, MF Nevada and I
4 are entirely innocent parties in this litigation. However, if this Court eliminates the bargained-for
5 protections, I, personally, and a small, Nevada-based employer will bear the cost.

6 12. For these reasons, I believe that good cause exists for the documents attached to
7 NML's memorandum and the descriptions of those contents to be filed under seal.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, to the best of my
9 knowledge and after reasonable inquiry, the foregoing is true and correct.

10 Dated this 28th day of October, 2014.

11

12

13

/s/ Patricia Amunategui

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

EXHIBIT “A”

EXHIBIT “A”

10/29/2014

Vultures companies hide data

Policy Today interested Runoff in Brazil Elections in Uruguay

Senators into law the
2015 budgetWould be asked to open
a case for trout billsConcert against 50
layoffs in Public TVA law that cuts the
freedom of expressionThey call Boudou not
chairing the meeting of
the BudgetCarrio and the new
Hydrocarbons Law

News

Sports

ExtraShow!

Style

Services

Clarín.com Policy 10.25.14

Vultures companies hide data

Analysis. The strategy of litigants against Argentina is to keep account information environment Kirchner

TAGS The Money Trail K, Money Laundering, Lazaro Baez, Switzerland

April Comment

49 shares

25

24



Ana Baron

At the request of the vulture funds, the Court of Nevada leading cases of "discovery" of the companies awarded Lazarus Baez and Christopher Lopez sealed the testimony of Patricia Amunategui, a key witness in the money trail K, and declared it "confidential".

Amunategui is the representative in Las Vegas in the US state of Nevada, the study Mossak & Fonseca Panamanian lawyer who took care of including all undertakings in that district. That is, Amunategui should be able to confirm who owns the companies who paid for those same companies were open and where the funds came to establish them. NML asked, however, that the testimony she gave on September 10 last was confidential. Thus, lawyers are the only NML know what Amunategui revealed.

But that's not all. NML also requested that all information obtained from now on during the "discovery" of both Baez also the case of Lopez, be kept confidential.

Why? What sense does that all the information is kept secret? NML research is using the money trail K to pressure President Cristina Kirchner to sit down and negotiate an agreement that allows them to charge the amount that ruled the judge's Thomas Griesa. In this context, it is very possible that NML wants to have control of how information is revealed and manage the times comes to light.

On December 31 overcomes RUFIOUS clause, which prevents the Government to make them a better deal vulture funds to other bondholders who got admitted to the exchange 2005 and 2010. On Wall Street there are many expectations that Argentina January accept sit down with vulture funds. In that case, vulture funds may take the information they have about the money trail K to the negotiating table to get a better deal. And if Argentina agrees not to negotiate, they may use the same information to compel it to do so. That is, in one way or another, the information will help them to extort Argentina.

as seen

Clarín.com

- 01 You are asked to not kill the girl who decided to die on Saturday
- 02 Another BBC journalist sparked a controversy over Falklands
- 03 The crime of Pampa remisera that resolved in an unusual way
- 04 Video Jessica Cirio hot you'd rather forget
- 05 River gold victory at La Plata was

on the cover

10/29/2014

Vultures companies hide data

There is another reason. NML is also possible that the court does not want to disclose the information because if you actually manage to find more information on the money trail K, other creditors will also try to capture the funds flowing through it.

In the case of Val de Loire, the company that is awarded to Christopher Lopez, Judge Peggy Leen decided not seal out the information to be arguing that NML has not provided sufficient reasons to maintain confidentiality. Anyway, Leen gave NML one square until Oct. 30 to present valid reasons for the restriction. Otherwise, all information will be public, including the testimony of Amunategui.

With criticism from the opposition, Senators into law the 2015 budget

you may be interested



TELEMUNDO
Latinos Who Are Recognized By their dress. Sofia Vergara And ...



With categories rat is already online game route ...
Readers can read the letter of each character and their pickpocket score.



Environment, terms, royalties and controls, themes more ...
Officials replied evasively in Congress to opposition questions about several key aspects of the project



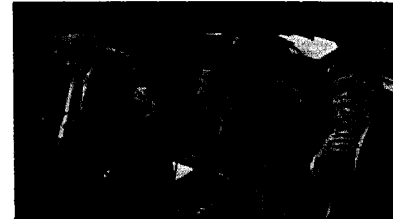
Justice of Ghana said the Fragata Libertad escaped
But for the NML was held in the African country between October and December 2012.



Before the robbery, Longobardi was following a red van
A video showing a Ranger that goes back before the attack journalist as overseeing the action.



Pichetto: "Santa Fe is the new Medellín"
The head of the K block a controversial comparison made to try to justify the need to expel foreigners. "If Santa Fe is Medellín ...



Less Scioli,
presidential
candidates signed
a pledge to discuss

More than 1,000
evacuated in
Province by storm



Remain in prison
seven Colombians
detained in North
Coast



Follow the rise of
the Luján River
and fear to reach
the Basilica



Recommended by

COMMENTS (To comment, your account must be active)



Post new comment

AdChoices

Marriott

**FALL INTO THE SEASON
WITH GREAT RATES.**

FROM \$79/NT **BOOK NOW**

10/29/2014

Vultures companies hide data

Log in

Send



MIGUEL ANGEL 4 days ago

How awful! VULTURES HAVE INFORMATION FOR SUCCESSFUL ATTORNEY extort and his accomplices. HIGH AND THIS SITUATION IS ENDORSED BY YANKEE JUSTICE. THAT IS SO TRAGIC K, NO LOSE WHAT WE STOLE, WOULD YOU PAY WITH OUR AVIDITY TWINE THE VULTURES. .

Answer February 0



Bruno Lomas 4 days ago



KORRUPTOS AIR LINES
(Kampora Group)
COMING SOON Jail the crooks

Answer Three 0



Alberto Urbanyi 4 days ago

ANA BARON what is your opinion ??? that will be hidden or not there ??? ... because it is a weapon that should be used now ..this is the time or just forming a media review on people afford to handle ??? ... a clarion always reach Lanatta media allegations that, although they never flourished in any prosecution or trial, the media effect among acephalous was useful ...

Answer 1 answer 0 Three



MIGUEL ANGEL 4 days ago

IT IS A WEAPON KORRUPTOS to blackmail.

Answer February 0

Owner Art Graphic Editorial Argentino SA
Copyright 1996-2014 Clarín.com - Clarín Digital - All rights reserved
Stones 1743 CABA

Edition No. 24750
Director: Ernestina Herrera de Noble
Responsible Editor: Ricardo Kirschbaum
Registration: 5014466

Archive
Services
Protection of Personal Data
Terms of Use & Privacy

GRUPO CLARIN



Contact us
Archive
Diario Olé
Journal Reason
Digital Library
Grupo Clarín

CLASSIFIEDS
BUSCAINMUEBLE
ARGENPROP
DEAUTOS
ENTREMujeres
IT VÍARESTO
ALL TRAVEL
CITY
COUPON CLUB

Advertising
Advertise with Us

A site